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COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Bay State Gas Company) D.T.E. 00-99

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ATTORNEY GENERAL'S FIRST SET OF

DOCUMENT AND INFORMATION REQUESTS

Pursuant to 220 C.M.R. 1.06(6)(c), the Attorney General issues his First Set of Data and Information Requests on February 26, 2001. Please answer in accordance with the accompanying instructions.

AG-1-1 Please provide a map of the PNGTS pipeline showing all interconnection points, delivery and receipt points, and the associated maximum capacity. For each point, include a description of all restrictions that affect the ability to transport gas at the maximum.

AG-1-2 Please provide complete copies of all tariffs related to the Company's PNGTS service. Annotate the tariffs to indicate the specific provisions that apply to each of the Company's contracts. Include a copies of the orders approving each tariff.

AG-1-3 Please provide a flow diagram identifying all sources of gas the Company has transported on PNGTS and tracking the flows through all connecting pipelines to the Company's distribution system. Indicate the delivered volumes for each peak and off peak period since the pipeline commenced service.

AG-1-4 Please provide all gas supply and storage contracts that relate to gas transported by the Company on the PNGTS pipeline since the pipeline commenced

service.

AG-1-5 If the Company has entered into gas supply agreements that could, but to date have not, used the PNGTS pipeline for delivery, please provide copies of these contracts and explain why the Company did not utilize the PNGTS pipeline to deliver these volumes and the circumstances under which PNGTS would be used.

AG-1-6 Please identify all end-use customers that may take gas directly from the PNGTS pipeline. Include the volumes delivered to each of these customers during each peak and off-peak period since the pipeline commenced service. The identity of the customer may be masked, if not publicly available.

AG-1-7 If the information is available to the Company, please identify all current contract PNGTS customers and the terms of their contracts (contract quantities, pricing terms and term of each contract).

AG-1-8 Please explain how the Company accounts for the PNGTS transportation costs and the cost of the gas transported on PNGTS. Include the details of all the related costs that are recovered through the Company's CGA (provide the total billed amounts for transportation and gas and the amounts charged customers through the CGA each season since the pipeline commenced service).

AG-1-9 Has the Company released any of the PNGTS capacity since the pipeline commenced service? If yes, please provide the volumes released, the dates (term) of each release, the price received for each release and how the Company accounted for these revenues (the dates and amounts that were flowed through the Company's CGA or LDAC). Please separately identify the volumes of capacity assigned to migrating customers as part of the mandatory assignment. Include the actual capacity release revenues and for each release and the associated amounts that were flowed through the CGA or LDAC each season.

AG-1-10 Please provide copies of all financial reports and statistical reports issued by PNGTS since 1994.

AG-1-11 Please provide copies of all the agreements related to the Portland Pipeline that are referred to in the Company's filing on page 3 of 40. If any of these agreements have been amended, please provide copies of all amendments in addition to copies of the original agreements.

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AG-1-12 Please provide copies of all the agreements with Direct Energy Marketing related to the gas supply referred to in the Company's filing on page 3 of 40. If any of these agreements have been amended, please provide copies of all amendments in addition to copies of the original agreements.

AG-1-13 Please provide copies of all the agreements with Coral Energy Canada, Inc. related to the gas supply referred to in the Company's filing on page 3 of 40. If any of these agreements have been amended, please provide copies of all amendments in addition to copies of the original agreements.

AG-1-14 Refer to page 4 of 40 of the Company's filing. Please explain, in detail, the circumstances and reasoning for the moving the interconnection point from one with TransCanada to one with TransQuebec. How did this affect the available sources of gas and the deliverability? Please provide a comparison of volumes and specific resources available through each, TransCanada and TransQuebec.

AG-1-15 Please provide the results of the SAGE model evaluations referred to on pages 24 and 25 of 40 of the Company's filing in both incremental resource volumes (by source) and total net present value.

AG-1-16 Please provide all the workpapers, calculations and assumptions supporting the Company's calculation of levelized PNGTS rates. Include an explanation of the levelization process. Please include a diskette containing the requested data and calculations in Lotus 123 format (version 9.5 or lower). This response must include the estimated total cost of the completed pipeline at the in-service date and details of all other elements supporting the PNGTS rates going forward.

AG-1-17 Refer to the Company's filing, page 22 of 40. Please provide the actual Canadian/NYMEX Henry Hub index basis differential for the period 1985-1995 and 1995-2000. Please provide all supporting data, calculations, workpapers and assumptions.

AG-1-18 Did the Company perform any analyses based on the slippage of the contemplated in service date of the PNGTS pipeline? If no, please explain why. If yes, please provide the assumptions and results in terms of both incremental resource volumes and net present value.

AG-1-19 Did the Company perform any analyses based on different PNGTS construction cost estimates? If yes, please provide the results of these analyses and all supporting workpapers, calculations and assumptions. Include the explanation for selecting the costs included in the Company's filing. If no, please explain why?

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AG-1-20 Please provide the initial cost estimates for the PNGTS pipeline, both capital and operating costs. Include all supporting documentation, the identity of source, and the purpose for which these cost data were prepared (regulatory, financial or statistical reporting, internal company use, etc.).

AG-1-21 Please provide the actual capital costs and estimated operating costs for the PNGTS pipeline at the in-service date. Include all supporting documentation, the identity of source, and the purpose for which these cost data were prepared (regulatory, financial or statistical reporting, internal company use, etc.).

AG-1-22 Please provide copies of all orders issued by regulatory agencies approving the construction of the PNGTS pipeline.

AG-1-23 Please provide copies of all orders issued by regulatory agencies approving the financing of the PNGTS pipeline.

AG-1-24 Has the Company used its PNGTS capacity in any way other than to deliver gas to its retail customers? If yes, please describe each instance. Quantify the benefits the Company received in each instance and how these benefits inure to the Company's retail customers.